

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

KELLY DAWSEY,

Plaintiff,

v.

BAYERISCHE MOTOREN WERKE
AKTIENGESELLSCHAFT and BMW
MANUFACTURING CO., LLC collectively
d/b/a “BMW GROUP,”

Defendants.

C.A. No. 7:22-cv-03738-TMC-KFM

**DEFENDANT BMW MANUFACTURING CO. LLC’S
MOTION FOR SUMMARY JUDGMENT**

COMES NOW Defendant BMW Manufacturing Co., LLC (“BMW MC”), by and through its undersigned counsel, and moves for summary judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure. Plaintiff asserts causes of action for national origin discrimination, race discrimination, and sex discrimination in violation of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §§ 2000, *et seq.*, and a cause of action for race discrimination pursuant to 42 U.S.C. § 1981.

As set forth in detail in the supporting Memorandum in Support of Defendant BMW Manufacturing Co., LLC’s Motion for Summary Judgment, which is fully incorporated herein by reference, BMW MC is entitled to summary judgment on all causes of action asserted by Plaintiff in this litigation. This Motion is further supported by the following exhibits being filed herewith:

Exhibit A: Deposition Excerpts of Plaintiff

Exhibit B: Deposition Excerpts of Robert Engelhorn

Exhibit C: Deposition Excerpts of Christine Petrasch
Exhibit D: Deposition Excerpts of Scott Medley
Exhibit E: Deposition Excerpts of Eva Burgmeier
Exhibit F: Deposition Excerpts of Sherry McCraw
Exhibit G: Deposition Excerpts of Sherrill Miller
Exhibit H: Deposition Excerpts of Kathryn Keiser
Exhibit I: Deposition Excerpts of Corey Epps

WHEREFORE, Defendant BMW MC respectfully requests that the Court grant its Motion for Summary Judgment and enter judgment as a matter of law in favor of BMW MC on all of Plaintiff's causes of action.

Respectfully submitted this the 16th day of February, 2024.

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